

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**BARBARA ANN BUTLER** :  
    **Debtor** : **CASE NO. 1:22-bk-02337**  
  
**FREEDOM MORTGAGE** :  
**CORPORATION,** :  
    **Movant** :  
  
**v.** :  
  
**BARBARA ANN BUTLER,** :  
    **Respondent** :  
  
:

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's research of payments made.
5. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's research of payments made.
6. Admitted.
7. Movant is protected by an equity cushion of at least \$54,000 and the allegation that the Movant lacks adequate protection is therefore denied.
8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.

9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.
10. Movant is protected by an equity cushion of at least \$54,000 and the allegation that the Movant lacks adequate protection is therefore denied.
11. Admitted.
12. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.
13. Denied that Federal Rule of Bankruptcy Procedure 3002.1 should be waived. Debtor should be notified of any change that results in the payment amount, including any change that results from an interest-rate or escrow-account adjustment.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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Dorothy L. Mott, Esquire  
Mott & Gendron Law  
Attorney ID # 43568  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
doriemott@aol.com